

Presentment Date and Time: October 30, 2019, at 10:00 a.m. (prevailing Eastern Time)

Objection Deadline: October 23, 2019, at 4:00 p.m. (prevailing Eastern Time)

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*Counsel to the Plan Administrator for the
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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
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Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
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Debtors. : (Jointly Administered)
:
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**NOTICE OF PRESENTMENT OF PLAN
ADMINISTRATOR'S, ON BEHALF OF THE DEBTORS, APPLICATION
FOR ENTRY OF A FINAL DECREE CLOSING CHAPTER 11 CASES PURSUANT
TO SECTION 350(a) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE 3022**

PLEASE TAKE NOTICE that, at **10:00 a.m. prevailing Eastern Time on October 30, 2019**, William D. Holden, as the plan administrator (the "Plan Administrator") for Gawker Media LLC ("Gawker Media"), Gawker Media Group, Inc. ("GMGI") and Gawker Hungary, Kft. "v.a.", f/k/a Kinja, Kft. ("Gawker Hungary"), the debtors (collectively, the "Debtors") in the above-captioned chapter 11 cases, will present to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, the application for a final decree closing chapter 11 cases, pursuant to section 350(a) of Title 11 of the United States Code, Rule 3022 of the Federal Rules of Bankruptcy Procedure and Local Bankruptcy Rule for the Southern District of New York 3022-1 (the "Application").²

¹ The last four digits of the taxpayer identification numbers of the Debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary, Kft. "v.a." (5056). The offices of the Debtors are located at c/o Alix Partners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, New York 10022.

² Capitalized terms used but otherwise not defined herein shall have the meanings ascribed to such terms in the Application.

PLEASE TAKE FURTHER NOTICE that, responses or objections, if any, to the Application shall (i) be made in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, (iii) set forth the basis for the response or objection and the specific grounds therefore, and (iv) shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers pursuant to Local Bankruptcy Rule 9028-1 and served so as to be actually received no later than **4:00 p.m. prevailing Eastern Time on October 23, 2019** (the "Response Deadline") upon: (i) the Plan Administrator for the Debtors, c/o AlixPartners, Attn: William D. Holden, 909 Third Avenue, 30th Floor, New York, New York 10022 (wholden@alixpartners.com); (ii) counsel to the Plan Administrator for the Debtors, Attn: Gregg M. Galardi, Kimberly J. Kodis and Roy Dixon, 1211 Avenue of the Americas, Ropes & Gray LLP, 34th Floor, New York, New York 10036 (Gregg.Galardi@ropesgray.com, Kimberly.Kodis@ropesgray.com and Roy.Dixon@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, Attn: Greg Zipes, 201 Varick Street, Suite 1006, New York, New York 10014 (Greg.Zipes@usdoj.gov); (iv) the Internal Revenue Service, Attn: Centralized Insolvency Operation, 2970 Market Street, Philadelphia, Pennsylvania 19104 (mimi.m.wong@irsounsel.treas.gov); (v) the United States Attorney's Office for the Southern District of New York, Attn: Bankruptcy Division, 86 Chambers Street, 3rd Floor, New York, New York 10007 (david.jones6@usdoj.gov, Jeffrey.Oestericher@usdoj.gov, Joseph.Cordaro@usdoj.gov, and Carina.Schoenberger@usdoj.gov); (vi) the Securities and Exchange Commission; and (vii) parties that have requested notice pursuant to Federal Rule of Bankruptcy Procedure 2002.

PLEASE TAKE FURTHER NOTICE that, if a response or objection is timely filed and served in accordance with this notice, such objection will be heard at a hearing to be scheduled by the Court.

PLEASE TAKE FURTHER NOTICE that, if no responses or objections are timely filed and served by the Response Deadline, the Debtors shall, on or after the Response Deadline, submit to the Court an order substantially in the form attached to the Application, which order the Court may enter without further notice or opportunity to be heard.

[Remainder of page intentionally left blank]

PLEASE TAKE FURTHER NOTICE that, a copy of the Application may be obtained free of charge by visiting the website of Prime Clerk LLC at <https://cases.primeclerk.com/gawker>.

Dated: New York, New York
October 16, 2019

By: /s/ Gregg M. Galardi
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